

## **Exhibit 1**

Supplemental letter from Dr. Tanaka  
dated June 20, 2024

H. George Tanaka, MD  
Co-Director, Glaucoma Service,  
California Pacific Medical Center  
711 Van Ness Avenue, Suite 330, San Francisco, CA 94102



June 20, 2024

Honorable Otis D. Wright II  
United States District Court – Central District of California  
First Street Courthouse, 350 W. 1st Street,  
Los Angeles, CA. 90012 - Courtroom 5D, 5th Floor.

Dear Honorable Judge Wright,

I am writing to bring to your urgent attention the critical medical situation of my patient, Mr. Alexander Smirnov, who is currently incarcerated in MDC-Los Angeles in the SHU. Mr. Smirnov has been under my care for many years for advanced glaucoma, a condition that requires consistent and rigorous medical treatment to prevent irreversible vision loss.

Before his incarceration, Mr. Smirnov was scheduled to undergo glaucoma surgery, a necessary intervention to manage his condition. However, during his time in prison, he was denied access to his prescribed glaucoma medications. This lack of treatment led to significant pain and progressively worsening blurry vision. Follow-up testing performed on June 11, 2024, by Dr. Erika Lauren Doss at Alliance Eye Surgery Partners has confirmed that his glaucoma has rapidly advanced due to the absence of necessary medical care.

Mr. Smirnov is now scheduled to undergo the previously postponed glaucoma surgery by an external ophthalmologist. It is imperative to understand that glaucoma surgery is not a one-time intervention but requires meticulous post-operative care. Regular follow-up visits are crucial to monitor intraocular pressure, ensure proper healing, and adjust medications as necessary to prevent further deterioration of vision.

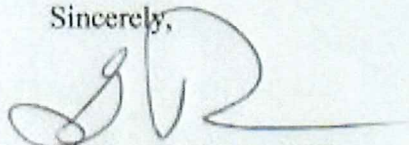
Neglecting these post-operative requirements would not only negate the benefits of the surgery but could also result in complete and irreversible blindness for Mr. Smirnov. As his attending physician, I strongly urge the court to ensure that Mr. Smirnov receives appropriate medical follow-up care post-surgery by releasing him from custody during his post-operative recovery.

period. This would allow Mr. Smirnov to receive regular care by a qualified glaucoma specialist and access to necessary medications and treatments which have thus far been unavailable while he is incarcerated.

The neglectful treatment Mr. Smirnov has endured thus far has already caused significant and avoidable damage to his vision. Ensuring his access to the required post-operative care is essential to prevent further harm and to uphold the standard of medical care that every individual is entitled to, regardless of their incarceration status. In addition, it must be noted that this neglect has led to Mr. Smirnov's inability to read the voluminous discovery in the case and to assist his lawyers.

Thank you for your attention to this urgent matter. Please feel free to contact me directly should you require any further information or clarification regarding Mr. Smirnov's medical condition and treatment needs.

Sincerely,

A handwritten signature in dark ink, appearing to be 'H. George Tanaka', with a long, sweeping horizontal line extending to the right.

H. George Tanaka, MD

Co-Director, Glaucoma Service

California Pacific Medical Center

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